

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PAUL CULBERTSON, KATHY NEAL,
KELLY ALLISON-PICKERING, JESSICA
HAIMAN, ALEXANDER CABOT, BRIANA
JULIUS, NICHELLE NEWLAND,
BERNADETTE NOLEN and ALEXANDREA
POLICHENA, *individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

DELOITTE CONSULTING LLP,

Defendant.

Case No.: 1:20-cv-3962-LJL (Lead Case)

Consolidated with:

Case No. 1:20-cv-04129-LJL

Case No. 1:20-cv-04077-LJL

Case No. 1:20-cv-04362-LJL

Case No. 1:20-cv-05070-LJL

1/29/2021

The motion for a stay is GRANTED. Parties are directed to provide the Court with a joint status updated by April 30, 2021.

SO ORDERED.

LEWIS J. LIMAN
United States District Judge

JOINT MOTION TO STAY

Defendant Deloitte Consulting LLP (“Deloitte”) together with Plaintiffs (collectively, the “Parties”) jointly move to stay these consolidated actions for ninety (90) days, and show the Court as follows:

1. Deloitte filed a Motion to Dismiss Plaintiffs’ Amended Consolidated Class Action Complaint on October 21, 2020. *See* Dkt Nos. 88-90. Briefing completed on Deloitte’s Motion to Dismiss on December 21, 2020. *See* Dkt. No. 111.
2. On January 25, 2021, the parties participated in a telephonic status conference with the Court, during which the Court requested that Deloitte withdraw its Motion to Dismiss without prejudice while the parties explore settlement.
3. Deloitte is contemporaneously filing with this Joint Motion a Notice of Withdrawal of its Motion to Dismiss Without Prejudice. Pursuant to the Court’s remarks during the January

25 status conference, Deloitte reserves the right to reinstate its Motion to Dismiss by re-filing the complete briefing and supporting documents of all parties as a single package.

4. The Parties request that the Court stay these consolidated actions for ninety (90) days from today's date, until April 29, 2021, in order to provide the parties time to engage in further settlement discussions.

5. At the conclusion of the 90-day period, the Parties will either inform the Court that they have reached an agreement in principle to resolve these actions, or Deloitte will reinstate its Motion to Dismiss as described above.

WHEREFORE, the Parties respectfully request that the Court stay these consolidated actions for ninety (90) days, until April 29, 2021.

Respectfully submitted this 29th day of January 2021.

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